

March 30, 2003

[From] Kohtaro Kohmoto, Chiyoda Kohan Co., Ltd.

[To] Dr. David H. Sliney, US Army

A Topic of Discussion for next Division 6 Meeting at San Diego (Proposal)
--- CIE S 009/E: Photobiological safety of lamps and lamp systems

Dear Dave;

Relating to your reply mail to me, I would like to propose to add a topic of discussion for the next Division 6 Meeting at San Diego, concerning to the CIE S 009/E: Photobiological safety of lamps and lamp systems, as follows.

1. Results of discussion at the IEC TC34 Meeting held on 1 November, 2002, in Beijing, China

According to Christine's information, IEC TC34 rejected the CIE S 009/E from being a Joint IEC/CIE Standard at its Beijing Meeting, held on 1 November, 2002, and IEC TC34 submitted comments and reasons of rejection to CIE CB. Though I have never seen neither IEC TC34's comments nor reasons of rejection, in spite that I asked you to send copies of them to me, rejection by the IEC TC34 is very serious problem for CIE (Division 6), and this matter shall be discussed immediately at Division 6 Meeting.

Next Division 6 Meeting will be held on June 30, 2003, at San Diego. As Division 6 Meeting at San Diego seem to be the best chance to have such discussion among Division 6 Members, I would like to propose strongly to add this matter as one of topics discussion at next Meeting.

2. Submission of counter-comments to the IEC TC34 to establish a Joint IEC/CIE Standard

My opinion to be submitted to the next Division 6 Meeting is as follows;

CIE must claim and demand the IEC TC34 to adopt the CIE S 009/E as a Joint IEC/CIE Standard strongly. Reasons of these my opinions are described hereinafter.

(1) Responsibility of establishing photobiological safety Standard

As photobiological safety standard of lamps and lamp systems is very important and crucial matter for lamps and lamp systems, it shall be naturally a Joint IEC/CIE Standard. IEC TC34 and CIE shall have equal responsibility to establish an International Standard. If IEC TC34 is escaping from discussion for establishing Joint IEC/CIE Standard, it is not anything other than IEC's shirking responsibility.

(2) "Normative Standard"

I hear IEC TC34 decided that it will be sufficient to use the CIE S 009/E: 2002 as a normative standard however, there must be serious misunderstanding in this idea. According to the ISO/IEC Directives, Part 2 – Rules for the structure and drafting of International Standards, in Section 6.2.2. Normative references, it is prescribed that the reference documents shall be documents published by ISO and/or IEC.

Therefore, if IEC want to use the CIE S 009/E as a normative standard in future any IEC Standard, it shall be a Joint IEC/CIE Standard. Of course, section 6.2.2 of this ISO/IEC Directives, Part 2 is prescribing exception case however, as this standard is concerning to substantial characteristics of lamps and lamp systems, exception rule shall be avoided and it is clear that the CIE S 009/E shall be substantially a Joint IEC-CIE Standard

Therefore, through discussion at the next Meeting, CIE Division 6 shall prepare document to claim and demand the IEC TC34 to adopt the CIE S 009/E as a Joint IEC/CIE Standard strongly and shall submit to the IEC TC34 later sooner.

3. Definition of "Normative Reference"

I am afraid that real intention of my question about definition of "Normative Reference", in my previous mail, was not well-understood by you (and others). Your mail seemed to be out of focus from my real intention. I would like to supplement my previous mail as follows;

Real intention of my question is what is difference between CIE S 009/E "as the normative document" and CIE S 009/E "as the informative document".

I am sure that in a document itself, there is no difference between them ("normative" and "informative"). Same document will be sometimes "normative" and will be sometimes "informative". This is because "to be normative or not to be" is 100 % originating in states of document standard which wants to use as "Normative References".

This clearly means that the IEC works were not concluded at this time and the IEC did not discharge its responsibility to establish International Standard on photobiological safety of lamps.

In conclusion;

It is unchanged that the IEC escaped its responsibility to establish Joint IEC-CIE Standard on photobiological safety of lamps. CIE shall call the IEC to account these escaping. I am sure that CIE Division 6 shall strongly call to the IEC TC34 after discussion at the next Meeting. (Or if you think that I am misunderstanding and my comments are wrong and there is no need to account the IEC TC34, you shall persuade me that your opinion is right and there is no need to account the IEC TC34. This is your responsibility as the Division Director.)

With the best my personal regards,

Sincerely yours,

Kohtaro Kohmoto,
Chiyoda Kohan Co., Ltd.